

Exhibit AH

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

TINA HERFORD and DOUGLAS)
HERFORD,)

)
Plaintiffs,) CASE NO:
) JCCP 4674/BC646315

VS.)

)
AT&T CORP., a subsidiary)
of AT&T, INC., and its)
subsidiary PACIFIC BELL)
TELEPHONE COMPANY; et al.,)
)
Defendants.)

ORAL TELEPHONIC DEPOSITION OF
STEVEN P. COMPTON, Ph.D.
SEPTEMBER 14, 2017
VOLUME II

ORAL TELEPHONIC DEPOSITION OF STEVEN P.
COMPTON, Ph.D., produced as a witness at the instance of
the DEFENDANT IMERY'S TALC AMERICA and CYPRUS AMAX, and
duly sworn, was taken in the above-styled and numbered
cause on September 14, 2017, from 10:16 a.m. to
5:11 p.m., before Melissa Stokes, CSR in and for the
State of Texas, reported by machine shorthand, at the
law offices of Simon, Greenstone, Panatier, Bartlett,
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and the provisions stated on the record or attached
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<p>1 Q. What part of ISO 10312 -- well, strike that.</p> <p>2 What did your lab do under ISO 10312 to</p> <p>3 check spacings for enstatite?</p> <p>4 A. We have standard asbestos reference materials</p> <p>5 as well as some standards for a variety of different</p> <p>6 interference minerals, but I don't recall if enstatite</p> <p>7 is one of them or not.</p> <p>8 Q. Would it be fair to say that as you sit here</p> <p>9 today you can't identify anything your lab actually did</p> <p>10 to check spacings for enstatite?</p> <p>11 A. Not beyond the procedures that were used in the</p> <p>12 method and for the reference standards that we have</p> <p>13 generally.</p> <p>14 Q. And with respect to ISO 10312, you don't even</p> <p>15 know if enstatite was checked for, correct?</p> <p>16 A. Not beyond identification of the minerals based</p> <p>17 on their chemistry and diffraction patterns.</p> <p>18 Q. And again, you don't know what the chemistry to</p> <p>19 diffraction pattern for enstatite are, correct?</p> <p>20 A. Not from memory. But this method is designed</p> <p>21 to identify and classify fibers to different asbestos</p> <p>22 mineralogies based on their chemistry and diffraction</p> <p>23 pattern analysis, which is what we did.</p> <p>24 Q. You just don't know if enstatite was part of</p> <p>25 the reference materials that you used for ISO 10312,</p>	<p>1 question?</p> <p>2 A. I don't recall.</p> <p>3 Q. And can you point us to anything in your</p> <p>4 reliance materials that would indicate whether you would</p> <p>5 expect to find enstatite in Italian talc?</p> <p>6 I'm sorry, sir, I think the answer may have</p> <p>7 been cut out. What did you say?</p> <p>8 A. No, I haven't answered.</p> <p>9 Q. Oh, okay.</p> <p>10 A. The only thing that comes to mind would be the</p> <p>11 report of Mr. Segrave's analysis, and I don't recall him</p> <p>12 identifying enstatite.</p> <p>13 Q. There's nothing else in your reliance materials</p> <p>14 that would indicate to you whether you would expect to</p> <p>15 find enstatite in Italian talc or not?</p> <p>16 A. Nothing that I can recall from memory.</p> <p>17 Q. Or that you can find in your reliance materials</p> <p>18 as you sit here today, fair?</p> <p>19 A. It's not something I've looked into</p> <p>20 specifically for enstatite.</p> <p>21 Q. Did your lab use PLM or XRD in its analysis?</p> <p>22 A. No.</p> <p>23 Q. Why not?</p> <p>24 A. Because TEM is the most sensitive method and</p> <p>25 best suited for this question.</p>
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<p>1 correct?</p> <p>2 A. From memory, I don't recall specifically what</p> <p>3 overlap enstatite may or may not have in common with</p> <p>4 anthophyllite.</p> <p>5 Q. Is there anything in your report or reliance</p> <p>6 materials that would let you answer that question?</p> <p>7 A. Not specific to enstatite.</p> <p>8 Q. Well, let's turn to Millette's paper. That's</p> <p>9 the one that relies on Dr. Su's spacing tables, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Do Dr. Su's spacing tables have enstatite?</p> <p>12 A. Not that I can recall.</p> <p>13 Q. Would you expect to find enstatite in Italian</p> <p>14 talc?</p> <p>15 A. I don't recall.</p> <p>16 Q. You don't recall if you expect to find it or</p> <p>17 not, or --</p> <p>18 A. That's correct.</p> <p>19 Q. -- you don't know?</p> <p>20 A. It's not something that I can recall from</p> <p>21 memory. If it's something that's addressed in some of</p> <p>22 the reliance materials, then those documents would speak</p> <p>23 for themselves.</p> <p>24 Q. Okay. Well, is there anything in your report</p> <p>25 in the reliance materials that would let you answer that</p>	<p>1 Q. Are you a trained PLM microscopist?</p> <p>2 A. Yes.</p> <p>3 Q. Have you ever identified amphibole in talc</p> <p>4 samples using TLM?</p> <p>5 A. I don't believe I personally have attempted to</p> <p>6 one way or the other. My lab has.</p> <p>7 Q. And when you say your lab, are you talking</p> <p>8 about the analysts who worked on this project, or a</p> <p>9 different group of people?</p> <p>10 A. I'm referring to the analysts at MVA.</p> <p>11 Q. The ones that worked on this project specific</p> <p>12 to this case?</p> <p>13 A. No. We didn't do PLM, so the analysts at MVA</p> <p>14 would not have worked on this project, the ones that do</p> <p>15 PLM.</p> <p>16 Q. My question is: Have the analysts who</p> <p>17 supported your report ever identified amphibole in talc</p> <p>18 samples using PLM?</p> <p>19 A. I don't know. They were asked to do TEM, so</p> <p>20 that's their background as far as I'm aware.</p> <p>21 Q. Does your report analyze any samples from any</p> <p>22 talc mines in Vermont?</p> <p>23 A. Not that I'm aware of.</p> <p>24 Q. From any talc mines in China?</p> <p>25 A. The setup samples did include a sample from</p>

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1 I have read the foregoing deposition transcript
2 and by signing hereafter, approve same.
3

4 Dated: _____
5
6
7
8
9 _____

(Signature of Deponent)

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1 COUNTY OF DALLAS)
2 STATE OF TEXAS)
3

4 REPORTER'S CERTIFICATE

5 I, Melissa Stokes, Certified Shorthand
6 Reporter in and for the State of Texas, hereby certify
7 that this transcript is a true record of the testimony
8 given.

9 I further certify that I am neither attorney
10 nor counsel for, related to, nor employed by any of the
11 parties to the action in which this testimony was taken.
12 Further, I am not a relative or employee of any attorney
13 of record in this cause, nor do I have a financial
14 interest in the action.

15 Subscribed and sworn to on this the 21st day
16 of September, 2017.
17
18
19
20

21 _____
MELISSA STOKES
Certified Shorthand Reporter
In and for the State of Texas

22
23
24 Certificate No. 8333
Expiration Date: 12/31/18
25